

Small Business Administration
Privacy Impact Assessment
For
Loan/Lender Monitoring System
September, 2005

Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the Loan and Lender Monitoring System (L/LMS). This document has been completed in accordance with the requirements of the E-Government Act of 2002.

MANAGEMENT CERTIFICATION – Please check the appropriate statement.

_____ The document is accepted.

_____ The document is accepted pending the changes noted.

_____ The document is not accepted.

We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

System Manager
John M. White, DAA/LO

DATE

OCIO/Project Representative
Ethel M. Matthews, Chief IT Security, OCIO

DATE

Office Head, & System Owner
Janet A. Tasker, AA/LO

DATE

OCIO
Charles McClam, Chief Information Officer

DATE

Chief FOI/PA
Lisa J. Babcock, Director FOI&PAO

DATE

Senior Official for Privacy
Delorice Price Ford, AA/H&A

DATE

Name of Project: Loan/Lender Monitoring System (L/LMS)
Program Office: Office of Lender Oversight (OLO)
Project's Unique ID: None

A. CONTACT INFORMATION:

1. Who is the person completing this document?

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2. Who is the system owner?

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Associate Administrator, Office of Lender Oversight
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3. Who is the system manager for this system or application?

John M. White
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4. Who is the IT Security Manager who reviewed this document?

Ethel M. Matthews
Chief of Information Security, Office of IT Security
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5. Did the Chief FOI/PA review this document? Yes.

Lisa J. Babcock
Director, Freedom of Information & Privacy Acts Office
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6. Did the Agency's Senior Office for Privacy review this document? Yes.

Delorice Price Ford
Senior Agency Official for Privacy
202-205-7340
delorice.ford@sba.gov

7. Who is the Reviewing Official?

Delorice Price Ford
Senior Agency Official for Privacy
202-205-7340
delorice.ford@sba.gov

B. SYSTEM APPLICATION/GENERAL INFORMATION:

1. Does this system contain any information about individuals?

NO. No information about any individuals is maintained in this on-line system and electronic database in any identifiable form. (Identifiable form is any of the following identifiable to the individual: name, address, social security number or other identifying number or code, telephone number, e-mail address, etc.) No information in any identifiable form about any individuals is collected, maintained, retrievable, or disseminated in this on-line system and electronic database.

The Office of Lender Oversight's (OLO) Loan and Lender Monitoring System (L/LMS) is a key office tool for risk management of the Small Business Administration's (SBA) 7(a) and 504 government guaranteed small business loan programs; including guaranteed loans, portfolios, portfolio segments, and resource partner lenders. Data from SBA's systems on small business loans and resource partner lenders is provided to L/LMS monthly. Private sector financial services business data on small businesses with SBA guaranteed loans (including a small business credit score) and on the resource partner lenders is provided to L/LMS quarterly. L/LMS consists of an on-line retrievable database, with a duplicate electronic file database, and numerous monthly, quarterly, and annual reports, and includes quarterly off-site lender ratings. Separately, L/LMS provides an on-line lender portal to allow appropriately authorized lenders to obtain limited authorized data on only their own portfolios.

The SBA data populated into the L/LMS on-line retrievable database (and duplicate electronic file database) monthly contains no information on any individual in any identifiable form. Quarterly SBA provides small business identification information, and one piece of information identifiable to the individual (from the SBA's System of Records) to our private sector financial services contractors for the purpose of obtaining business and consumer credit bureau information to produce a small business credit score. This small business credit score is produced by the contractors outside of the L/LMS on-line retrievable database (and duplicate electronic file database); and in itself has no information in any identifiable form on any individual. This small business credit score is populated into the L/LMS on-line retrievable database (and duplicate electronic file database) quarterly. The one piece of information on an individual that is in identifiable form is never populated

into the L/LMS. No other piece of information on any lender in any identifiable form is ever populated into L/LMS. Also, quarterly, private sector financial services data on small businesses with outstanding SBA guaranteed loans, and on the SBA's resource partner lenders is populated into L/LMS. None of this data on small businesses and lenders contains any information on any individuals in any identifiable form. The L/LMS on-line retrievable database (and duplicate electronic file database) does contains no information on any individual in an identifiable form.

This September 2005 Privacy Impact Assessment (PIA) submission is an update; the original PIA for L/LMS was submitted October, 2003. L/LMS became operational September 30, 2003. This revised PIA is to be publicly posted after submission to the Office of Management and Budget (OMB). L/LMS is not a System of Records (SOR).

- (a) Is this information identifiable to the individual?** (If there is **NO** information collected, maintained, or used that is identifiable to the individual in the system, the remainder of the Privacy Impact Assessment does not have to be completed past this section. **Note:** Clearance sheet must be signed and copies to IT Security and Chief FOI/PA must be provided).

NO. No information identifiable to the individual is maintained in this on-line system and electronic database in any identifiable form. (Identifiable form is any of the following identifiable to the individual: name, address, social security number or other identifying number or code, telephone number, e-mail address, etc.) No information identifiable to the individual in any identifiable form is collected, maintained, retrievable, or disseminated in this on-line system and electronic database.

- (b) Is the information about individual members of the public?**

NO. No information about any individual members of the public is maintained in this on-line system and electronic database in any identifiable form. (Identifiable form is any of the following identifiable to the individual: name, address, social security number or other identifying number or code, telephone number, e-mail address, etc.) No information in any identifiable form about any individual members of the public is collected, maintained, retrievable, or disseminated in this on-line system and electronic database.

- (c) Is the information about employees?**

NO. No information about any employees is maintained in this on-line system and electronic database in any identifiable form. (Identifiable form is any of the following identifiable to the individual: name, address, social

security number or other identifying number or code, telephone number, e-mail address, etc.) No information in any identifiable form about any employees is collected, maintained, retrievable, or disseminated in this on-line system and electronic database.